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8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 RAYMUNDO NAVARRETTE,

12 Defendant.

Case No.

15cr2630-CAB

I N F O R M A T I O N

Title 18, U.S.C., Sec. 215 - Bank
Bribery

13 The United States Attorney charges:

14 COUNT 1

15 In and around 2010 through 2013, in the Southern District of
16 California, defendant RAYMUNDO NAVARRETTE, as an officer, employee,
17 and agent of a financial institution, corruptly solicited and
18 demanded for the benefit of himself, and corruptly accepted and
19 agreed to accept, anything of value, in that NAVARRETTE agreed to
20 accept monetary compensation and other things of value exceeding
21 \$1,000, in exchange for impeding Citibank, N.A.'s obligations under
22 Title 31, United States Code, with the intent to be influenced and
23 rewarded in connection with the business of such institution, all in
24 violation of Title 18, United States Code, Section 215.

25 DATED: October 15, 2015

LAURA E. DUFFY
United States Attorney

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27 s/ Daniel C. Silva
Daniel C. Silva
Assistant U.S. Attorney
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